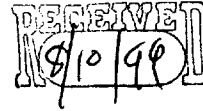


# PREMIER DIRECT<sub>INC.</sub>

245 N.E. 4th Avenue, Suite 201, Delray Beach, Florida 33483  
(561) 278-6080 TEL • (561) 278-1139 FAX

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July 27, 1999

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, SW  
Washington, D.C. 20204

RE: 21 U.S.C. Section 343(r)(6) Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Dr. Willix's Joint Formula, a dietary supplement. Premier Direct, Inc. is a manufacturer of Dr. Willix's Joint Formula.

Statements Being Made in the Labeling of Dr. Willix's Joint Formula

- (1) Support optimal joint strength and flexibility
- (2) support joint health and flexibility
- (3) the key ingredients in Dr. Willix's Joint Formula promoted all the major functions

To the best of my knowledge, and based upon information and belief present at the time of executing this notice, I certify that this information is accurate and complete and Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

A handwritten signature in cursive script, reading "John L. Russell", followed by a horizontal line.

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